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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

COURTESY COPY

**IN RE ALIBABA GROUP HOLDING
LIMITED SECURITIES LITIGATION**

Civil Action 1:15-md-02631 (CM)

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**NOTICE OF MOTION AND MOTION FOR CLASS CERTIFICATION AND
APPOINTMENT OF CLASS REPRESENTATIVES AND CLASS COUNSEL**

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PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and the Declaration of Laurence Rosen and its accompanying exhibits, Court-appointed Lead Plaintiffs William Tai and Christine Asia Co., Ltd. and named plaintiffs Abel Amoros, Arthur Gabriel, Raymond Lee, and Gang Liu, who together are proposed class representatives, move the Court, before the Honorable Colleen McMahon, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 24A, New York, New York, 10007, for an Order:

1. certifying this action pursuant to Rules 23(a) and (b)(3) of the Federal Rules of Civil Procedure as a class action;

2. defining the Class as:

All persons and/or entities that purchased or otherwise acquired Alibaba Group Holding Limited (“Alibaba”) American Depository Shares (“ADS”), or purchased call options or sold put options on Alibaba ADS, during the period September 19, 2014, through January 28, 2015, inclusive (the “Class Period”), other than those shares purchased directly in the September 19, 2014 Initial Public Offering.

Excluded from the Class are: (a) persons who suffered no compensable losses; and (b) Defendants; the present and former officers and directors of Alibaba at all relevant times; members of their immediate families and their legal representatives, heirs, successors, or assigns; and any entity in which any of the Defendants, or any person excluded under this subsection (b), has or had a controlling interest at any time.

3. appointing Lead Plaintiffs William Tai and Christine Asia Co., Ltd. and named plaintiffs Abel Amoros, Arthur Gabriel, Raymond Lee, and Gang Liu as Class Representatives for the Class;
4. appointing The Rosen Firm, P.A. as Class Counsel; and
5. granting such other and further relief as the Court deems necessary and proper.

DATED: March 12, 2018

THE ROSEN LAW FIRM P.A.

By: /s/ Laurence Rosen

Laurence Rosen

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Lead Counsel for Plaintiffs and the Proposed Class

CERTIFICATE OF SERVICE

I, the undersigned say:

I am not a party to the above case, and am over eighteen years old. On March 12, 2018, I served true and correct copies of the foregoing **NOTICE OF MOTION AND MOTION FOR CLASS CERTIFICATION AND APPOINTMENT OF CLASS REPRESENTATIVES AND CLASS COUNSEL**, by posting the document electronically to the ECF website of the United States District Court for the Southern District of New York, for receipt electronically by the parties listed on the Court's Service List.

I affirm under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on March 12, 2018, at New York, New York.

/s/ Laurence Rosen
Laurence Rosen